

1887-061 Chancery Causes: William D. Zion vs. Barbary J. Zion  
Lee Co. Barbary J. Zion vs. William D. Zion

1 Plat

CA-Estate Dispute  
T-Property

-Reed

To the Honorable John A. Kelly,  
Judge of the Circuit Court of Lu County  
Ky

Humbly complaining, your  
orator Wm. D. Giam a citizen of said  
county would beg leave to repre-  
sent unto your Honor; That John  
P. Giam departed this life on the  
day of 1885 seized &  
possessed of three valuable tracts  
of land situated, lying and being  
in Lu County on the Brush ridge  
and about eight miles East of the  
town of Jourdell, copies of the  
deeds to said land are here filed  
and marked "A, B, & C" respectively  
and prayed to be considered as a  
part of this, your orator's, bill of  
complaint; That your orator is the  
son and only heir at law of the  
said John P. Giam; That the deces-  
ed John P. Giam left surviving him  
his widow, Barbary J. Giam;

With the above premises your  
orator is advised that he is in-  
titled to said tracts of land, sub-  
ject to the dower interest of the  
said Barbary J. Giam in said  
tracts of land, and he is cognizant



that it was his duty as him to  
said John P. to <sup>have</sup> assign to said  
widow her dower interest in  
said tracts of land, which duty  
he often and repeatedly <sup>th</sup> proposed  
to do, but the said widow as  
often refused to assent to the  
assignment of her dower; and  
your orator is further advised that  
your Honor's court is the guardian  
and protectorate of the rights of  
hirs as well as those of widows;  
he therefore comes to your court,  
and begs your Honor to take cog-  
nizance of his cause, appoint  
proper commissioners to assign  
said widow her full dower in  
said lands, make the said widow,  
Barbary J. Jiam, a party defend-  
ant to this bill of complaint,  
<sup>the said Barbary J. Jiam</sup>  
that she <sup>be</sup> required to answer  
upon her corporal oath, as ful-  
ly and effectually each and every  
averment contained in this bill  
of complaint, as if she had been  
specially interrogated thereto,  
and that such other and  
general relief may be granted



and given to your orator as the  
nature of his cause may demand  
and that may be adapted to equi-  
ty and good conscience. May  
Suppenna issue. And your  
orator will ever pray &c

Duncan & Pennington  
and Richmond & Orr

Attys for Comfells.



Wm D. Gian

W. { Bierin Chan

Barth J. Gian

1880 July Bill file d.

Spd Exp + D. Vise

" Aug. L. Ch. Conf d

+ Cause set for hearing

" Nov. Continued

1887 Mr. Bierie + Counts

" Aug. Decree + counts

" Nov. Decree final

1880 to 1890

3

6 \$9.05  
2.50  
1.40  
15.00  
7.00  
5.00

28/39.75  
\$19.97 1/2

5.00  
2.11  
\$2.89



To the Honorable John A. Kelly, Judge  
of the Circuit Court of Lee County:

Humbly complaining, your orator  
William D. Gion, a citizen of said county,  
would respectfully represent unto your  
Honor, that John P. Gion on the  
day of 1885 departed this life seized  
and possessed of three large and val-  
uable tracts or parcels of land lying  
and being in said county about eight  
miles East of the town of Jonesville and  
on the Canoe Creek ridge, copies of the  
deeds of said tracts or parcels of land  
are here filed and marked "A," "B." &  
"C" respectively, and prayed to be consider-  
ed as a part of your orator's bill of  
Complaint; that the said John P. Gion  
deceased, left surviving him his wife  
Barbary J. Gion, and your orator; and  
that your orator is the son and only heir  
at law of the said John P. Gion dec'd.

With these premises your orator  
is advised that by the laws of Virginia,  
the fee simple lands of which the  
said John P. Gion died seized and  
possessed passed to, and descended upon  
your orator as heir to the said  
John P. Gion subject to the rights of



the said widow's dower in said tracts  
or parcels of land; and your orator is  
also advised that it his duty to assign  
said widow her dower in said  
lands; And your orator is further  
advised that your Honor's Court,  
being the guardian and protectorate  
of the rights of him, as well as those  
of widows, will take cognizance of  
his cause and grant him such  
relief as equity and good conscience  
will deem proper and expedient  
from the nature of his cause; there-  
upon he comes meekly to your  
Honor's Court and reverently prays  
your Honor to take cognizance of  
his cause, to appoint commissioners  
to assign said widow dower in said  
lands, to make the said Barbara J.  
Gion a party defendant to this bill  
of complaint, to require her upon  
her corporal oath to answer each  
and every averment and allegation  
contained therein as fully and pre-  
cisely as if she had been specific-  
ly and specially interrogated thereto,  
and to grant him such other and

general relief as may be in keeping  
with equity and good conscience  
and that may be adapted to the right,  
peculiarity and nature of his cause.  
May Subpoena issue &c.

Duncan Pennington  
Pro Quarenti



W. D. Ginn

25. { Bill in hand

Barbary J. Ginn

90 to 00

3-



To The Hon. John A. Kelley Judge  
of the Circuit Court of Lee County

The Cross bills of Barbara J.  
Lyon, to bill filed in this Hon.  
Court against her by one D. Lyon

Your oratrix would state that  
she is entitled, not only to dower  
but, entitled in fee to most of  
said land; Your oratrix would  
state that while her said deceased  
husband holds the legal title, he  
paid for the same mostly out  
of the separate estate of your  
oratrix ~~Before~~ <sup>at</sup> the time of the pur-  
chase of these lands by her husband  
and before, and after it was  
agreed by him if your oratrix  
would aid in the payments  
then, he would have secured her  
rights in the land, but he failed to  
do so. under this agreement  
Contract and understanding made  
at the times aforesaid, she did  
pay or her said husband did for  
her, out of the sales of her own  
separate estate, the sales of land  
derived by descent from her father  
all of which, came to her hands



Since the year 1876—

Of her father's estate which de-  
scended to her she paid Cash \$300.

A horse at the price of 90.

From her sister's estate — 30—

or possibly more and of her  
grand father's estate \$10

And there were probably other  
payments made by her said  
husband out of her estate not

now remembered. Your oratrix  
alleges that these payments were  
made for her benefit, and in-  
tended so at the time and that

she is advised she is entitled  
thereto in fee, and to deliver in  
the residue — Her prayer therefore

is that Wm D. Lyon be made a  
party defendant to this bill

and answer its allegations on  
oath & on a hearing a decree  
be rendered, setting apart to her  
in fee so much land as  
were paid for out of her  
separate estate, and down assign  
in the residue and for all  
after further & general relief—



May 2nd 1880  
A. L. Dickerson  
P. 2.



40  
15  
25  
20  
10  
18  
10  
18  
100  

---

2.47

Bombay & Linn

W. J. Long Bill

Am D. Linn



To the Honorable H. S. K. Morrison, Judge of  
the Circuit Court of Lee County, Va.

The answer of W<sup>m</sup>. D. Ziem defendant to  
a cross-bill of Complaint exhibited against  
him by Barbara J. Ziem Compt. in the Chan-  
cery cause of W<sup>m</sup>. D. Ziem vs. Barbara J. Ziem  
and now pending in this court.

Your respondent reserving to him-  
self all just exceptions to the said cross-  
bill for answer thereto, as to so much  
thereof, as he is advised that is material  
he should answer, answers and says. That  
he fully and wholly denies that any of the  
separate money or property of the said  
Compt. formed or constituted any part  
of the consideration in the purchase of the  
said land. But your respondent just  
here admits that some of the money of the  
said Compt. was appropriated to the  
payment of some of the debts owed by  
the said John P. Ziem in his life-time  
the consideration of which debts hap-  
pened to be for the same land to which the  
said John P. Ziem died seized and possessed.  
Your respondent further denies that  
there was any agreement or arrangement  
or understanding as set out in Compt's  
cross-bill, between the said John P. Ziem



+Compl't.

either before or after the purchase of  
said land that he would have secured to  
her, if she would help him to pay for  
the said land, any rights or interests in the  
same, other than such rights as the law  
of this country of itself vests in her. And  
your respondent also denies that the horse  
spoken of in Compl't's. Cross-bill was  
~~not~~ gotten by the said John D. Ziam \*  
after the 4<sup>th</sup> of April 1877 but was  
gotten as well as your respondent <sup>and is advised</sup> remem-  
bers, as far back as the year 1878. And  
more, as per the receipt of James H. Jaynes  
personal representation of St. Murcy it  
will be seen that the said John D. Ziam  
had to refund to the said Admr. the sum  
of \$43.46<sup>4</sup>. said receipt is here filed  
and marked "X". But as before stated  
by your respondent if anything was  
ever paid by the said Compl't., it was  
paid in to debts of the said John D. Ziam  
that <sup>he</sup> owed at the time the said Compl't.  
sold her said land, and which debts  
owed by the said John D. Ziam happened  
to be for the identical land mentioned  
in your respondent's original bill,  
And Compl't's money for her land being  
paid in the usual and common  
manner in which good husbands  
& wives deal with reference to one



another's property, each considering  
the estate of the one the property of  
the other and so she permitted and  
consented that her separate estate  
might be used in the payment of her  
husband's debt without even once  
thinking of holding him responsible  
for the same and without any agree-  
ment or understanding that she was  
to have any interest in said lands  
other than the customary dower  
interest.

Your respondent is actually  
surprised at the matter and purport  
of said Compt's. cross-bill for the  
same seems to him to be so unreason-  
able, when the same is viewed in the  
light of the circumstances of this case.  
The deeds to said lands were taken and  
acknowledged long before the death  
of the said John P. Zier and that with  
the full and actual knowledge and  
consent of the said Compt. as to the  
purport and tenor of said deeds from  
their date of execution almost, or at  
least as your respondent is advised  
she had constructive knowledge of the  
purport and tenor of said deeds from  
the time of their registry in the Clerk's  
of said county which appears by ref



venue to copies of said deeds here filed  
in this cause and marked "A. B. C."  
respectively, to have been done long  
before the death of the said John  
P. Zion. Yet with such knowledge  
of the manner in which the said  
deeds had been made, to your corres-  
pondent's knowledge did she ever  
make any complaint to the said John  
P. Zion or to any one else that her  
rights were trammelled or infringed  
upon in any right or title after the  
death of the said John P. When your  
respondent began to want to share in  
the possession, accretions and profits  
of the said land owned by him in his  
life time; and now having fully  
answered the said Campbell's cross-bill of  
complaint your respondent prays  
to be hence dismissed with his rea-  
sonable costs in this behalf expended,  
and he will ever pray &c.

H. D. Zion by  
Sweeney & Cunningham

Virginia

Lin County, to wit:

This day personally ap-  
peared before me



for the county and state aforesaid  
W. D. Zion whose answer is above writ-  
ten and made oath that the statements  
contained in said answer, so far as  
made of his knowledge are true, and  
so far as made from the knowledge  
and information derived from others  
he believes to be true

Given under my hand this the  
29 day of March 1887  
J. A. Hyatt cc



H. O. Zim

ads { answers to  
2 Cross-bills

Barbary J. Zim

---

Filed in open  
Court by leave  
thereof March 29 '88  
J. S. Hyatt ce



W. S. Zion Campb't.

or

Barbary J. Zion Deft.

} In Etiam.

This cause came on again this day to be heard upon the papers formerly read in the cause and the report of John M. Tate which is annexed to, and was argued by counsel: On consideration of all which and for reasons appearing to the court it is ordered, adjudged and decreed that said report be confirmed, and that W. S. Zion take and hold in fee simple the following described tract of land bounded as follows, to wit: Beginning at point B. of the plat in said report and on John J. Garry's line S. 80° W about 3 poles to a planted rock, N. 24 <sup>3</sup>/<sub>4</sub>° W 186 poles to a cedar in a line, corner of John F. Skaggs' land, N 74° E 70 ft. to the point A on said plat, S 12° E 130 ft to the beginning; and that Barbary J. Zion take and hold for her life the following described land set out in said report, to wit: Beginning at the point A in said plat N. 74° E. 20 ft to a poplar



and wahoo. N. 42. 37 ft. to a spring  
at the head on said flat; N. 28. W. 12 ft  
to a huch stump, N. 57 1/4 E. 8 1/2 ft. to  
the wagon road, S. 23 1/2 E. 14 ft, S. 48 1/2 E  
4 ft, S. 69 E. 16 ft. S. 53 1/2 E. 2 ft. S. 21 E. 14 ft.  
to a rock in or near said road, ~~S. 67 E.~~ S  
61 E. 7 3/4 ft. S. 83 E. 17 ft, S. 13 E. 17 ft. to the ~~main~~  
~~road~~ rock of three fumes, S. 74 W. 30 3/4 ft  
to the main road, S. 26 1/2 W. 42 ft along  
said road east of a pond S. 12 E. 13 1/2 ft  
to a small chestnut-corner to John J.  
Granny's land, thence with granny's line  
S. 80 W. 23 1/2 ft to the point-A on said  
flat, N. 12 W. 180 poles to the Beginning.

And it is further ordered and  
decree that the costs of this suit  
be paid in pursuance, by the par-  
ties, to a decree entered in the cause  
on the 31st day of August, 1887, and  
for the collection of which an exe-  
cution may issue, and this cause  
is ordered to be stricken from the docket.

W. S. Zinner  
v. }  
Barney J. Zinner

Barney J. Zinner

Entered Page 80

C. O. B. W. E.

A. G. H. G. H. G. H. G.

Examined March 30  
1888

Entered this  
H. A. K. Mc  
one. 7 1887.



W D Jion  
or  
Barney J Jion } In ch

For reasons  
appearing to the court it is  
adjudged ordered & decreed that  
this cause be continued,



W. D. Zion  
vs 3 Dec  
Borben J. Zion  
~~March~~ Lem 1887  
Entered page 31

Enter  
March 31 1884  
H. D. M.



M. D. Zion

Barbary J. Zion } In chancery.

This cause came on this day to be heard upon the bill of Complaint, and exhibits filed therewith, the Cross-bill of Def't, and answers of M. D. Zion thereto And was argued by counsel. By consent of parties it is ordered, adjudged and decreed that

he and is appointed  
of commissioners for the purpose and that they at their earliest convenience go upon the land in the bill and proceedings mentioned and lay off, allot and assign to Barbary J. Zion for her life one half <sup>in</sup> of the rental value of the lands aforesaid including the dwelling and out houses ~~and~~ the said John P. Zion lived at the time of his death, which dwelling and out houses shall be taken into consideration by said Commrs. in their determination of the rental value of said lands; and they will assign and allot the other half of said land to M. D. Zion in each case having due regard and reference to ways, water and conveniences; and report their action to a future term of this Court.

And by consent of parties it is further, ordered, adjudged and decreed



W.D. Ziem

vs { Decem

Barbary J. Ziem

Entered page 38

C.D. Book No. 3

J. H. G. & Co. atty.

Entered this

A.D. 1887  
Aug 31 - 1887

that the said Barbary J. Ziem shall  
~~pay all costs in this cause according~~  
~~to the decision of the court, and one half~~  
~~of the residue of the cost, by reason~~  
~~of the bringing of this suit by the said~~  
and the said W.D. Ziem will pay the other  
half, and for said costs, ~~which~~ <sup>by the said</sup>  
will properly sum up, and pre-  
sent <sup>the</sup> therefor against either the  
said parties, and this cause is con-  
cluded.



Virginia

At a circuit court continued and  
held for Lee Co. at &c on 31<sup>st</sup> day of Aug 1887.

W.D. Zion

Plaintiff

vs.

In Chancery

B. J. Zion

Defendant

x x By consent of parties, it is adjudged  
ordered, and decreed that Jos. W. P. W. J. Plumer, E. Kitter  
and Samuel Carter, be and are appointed Comrs.  
for the purpose, and that they at their earliest  
convenience go upon the lands in the bill and  
proceedings mentioned, and lay off, allot, and  
assign to Barbara J. Zion for her life  $\frac{1}{2}$  in  
rental value of the lands afore said, including  
the dwelling and out houses, where the said  
Jos. P. Zion lived at the time of his death, which  
dwelling and out houses, shall be taken  
into consideration by said Commissioners in  
their determination of the rental value of  
said lands, and they will assign and allot, the  
other half of said lands to W. D. Zion, in each case  
having due regard to water, ways and conveniences  
and report their action to a future term of this court  
and by consent of parties, it is further adjudged, or-  
dered, and decreed, that the said Barbara J. Zion  
shall pay  $\frac{1}{2}$  and that W. D. Zion the other half  
of the costs of this suit, and execution may issue  
therefor against either of the parties, and the cause  
is continued (over)



A copy  
Lester J. A. Syatt

M. D. Zion  
43. 3<sup>rd</sup> Decree,  
Barbara J. Zion

M. D. Zion  
23 copy of Decree

Barbara J. Zion

Executed by  
delivering an copy  
of the Decree to  
John W. Sals  
Wm. J. Salsmar  
Samuel Carter

C. W. Sittler

Spt. 23 1897

12 9 January 98 for

S. H. Ewing 396

Fee for Copies 1.68  
Fee for Sheriff 2.00



W. O. Grim et al  
vs. 3  
Barbara Grim et al } In chancery.

Pursuant to an order issued from the circuit court of Lee County Va at its August term 1887. Relative to the above styled Suit I went upon the lands in the order mentioned and by agreement of both the Plaintiff and Defendant I proceeded alone to Partition the lands without the aid of the other Commissioners and both parties were well satisfied I found the following plat of land as shown by the accompanying plat containing one hundred & two acres Beginning at a Spring and shown on the plat at hand. Thence from there to 2 and on to 17 and to Beginning first line N. 28. W. 12 poles to 2. to a beech stump thence N. 51  $\frac{1}{4}$ . E. 8  $\frac{1}{2}$  poles to the wagon road. Thence with said road. S. 23  $\frac{1}{2}$ . E. 14 poles. S. 48  $\frac{1}{2}$ . E. 4 poles S. 69. E. 16 poles S. 53  $\frac{1}{2}$ . E. 2 poles. S. 21. E. 14 poles to a rock in or near the road S. 61. E. 7  $\frac{3}{4}$  poles to a stake. S. 83. E. 17 poles to a stake at the turn of the fence S. 13. E. 17 poles to a stake near the end of three fences S. 74. W. 30  $\frac{3}{4}$  poles to the main road. S. 26  $\frac{1}{2}$ . W. 42 poles along said road. to a stake east of a fence. S. 12. E. 132  $\frac{1}{2}$  poles to a small chestnut corner of Geo. Geary's land

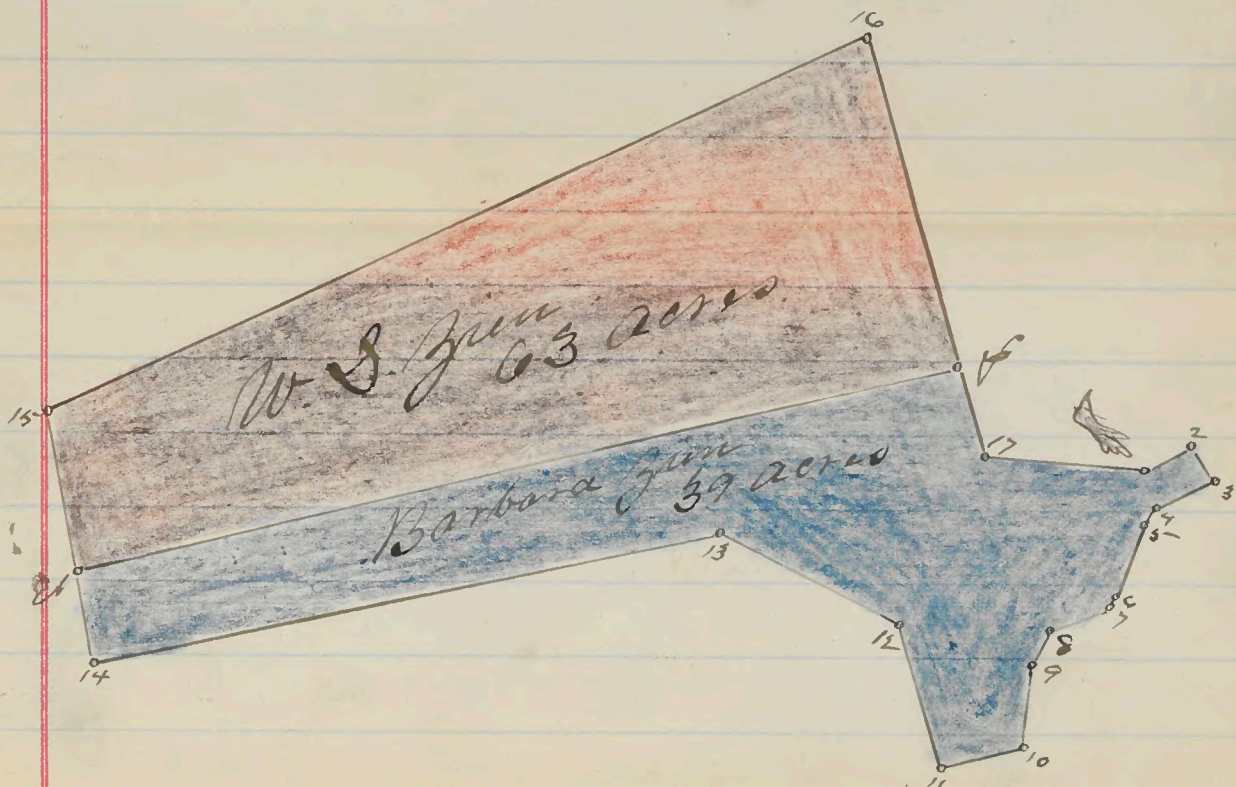


Thence with a line of Geary's S. 80. W. 53 1/2 poles  
to a planted rock, Thence N. 24 3/4 W. 186 poles  
to a cedar in a lane corner of Geo. F. Seago's  
Thence with his line N. 74. E. 90 poles to a poplar  
and waukes at the corner of three fences Thence  
N. 4. E. 37 poles to the Beginning, When I made  
the Survey as shown above, the parties then  
agreed to make their own division. The Plain-  
tiff W. S. Gein gets the part of the first  
tinged red containing about Sixty three  
acres The Defendant gets the part of the  
peat-tinged blue containing about thirty  
nine acres. The Division line is shown  
on the plat from A. to B. and  
each of their shores is marked to them  
The Plaintiff W. S. Gein 63 acres and  
Defendant Barbara Gein 39 acres.  
The Division line is on S. 74. W. 18 poles from  
the poplar and waukes on the Seago's line  
on the north of the Survey, and then running  
through the farm, so as to strike the south  
line 18 poles S. 80. W. of the small chestnut,  
Geary's corner, all of which I submit  
with the following bill of costs.

Geo M. Tate Fee. \$7.00 Paid

Geo. M. Tate, Commissioner





Virginia. Lee County Court clerk's office Jan'y 5<sup>th</sup> 1888  
 The foregoing plat & report of the partition of  
 the land of John P. Zinn deeds was this day  
 filed in this office and admitted to record.  
 Test John R. Gibson Clerk



W. S. Grinn  
vs. 3 In chan.

Barbara Grinn  
Commissioner  
Report

Filed Dec. 5<sup>th</sup> 1887  
J. A. Hyatt & Co.

Recorded in Deeds  
Book No. 23 P. 171-213  
J. R. Gilson & Co.

Examin'd Nov 30  
1888

Comrs fees 7.00

18	30
6	36
12	86
	125
	241



This deed made and entered into on the first day of January 1887, by and between Abraham D. Zion and Anna his wife of the first part, and John P. Zion of the second part, all of the county of Lee and State of Virginia Witnesseth that in consideration of the sum of four hundred and twenty four dollars in hand to them paid the receipt of which is hereby acknowledged the said parties of the first part, hath this day bargained and sold to the said party of the second part, a certain tract or parcel of land lying and being in the county of Lee and State of Virginia on the South side of Cam Creek ridge containing  $82\frac{1}{2}$  acres be the same more or less, and bounded as follows to wit: Beginning at a cedar in a lane corner to Lafayette McGraws lands on a line between A. D. Zion and John Myers deceased, and with said line South  $26^{\circ}$  E. 600 1881 poles to a stake in a snag  $80^{\circ}$  E  $51^{\circ}$  poles to a small chestnut, on the dividing line between John Parsons and A. D. Zion and with said line  $N 15^{\circ}$  W. (now  $13\frac{1}{4}^{\circ}$  W 1887 poles to a stake on top of a ridge, thence with said line  $N 6^{\circ}$  E 3 poles to a wahoo. and poplar corner to Lafayette McGraws lands and with a line thereof  $S 73\frac{1}{4}^{\circ}$  W 90 poles to the beginning, and the said Abraham D. Zion and Anna his wife will forever warrant and defend against the claim or claims of any and all persons whomsoever the lands hereby conveyed, Witness the following signatures



and seals this day and date above written.

Abraham D. Zion ~~Dea~~

Anna Zion ~~Dea~~

Virginia, Lee County to wit;

I, John R. Gibson Clerk of Lee County Court in  
the State aforesaid do certify that Abraham D. Zion  
and Anna Zion his wife whose names are signed  
to the foregoing deed dated January 1st 1881. each per-  
sonally appeared before me in the said county, and  
acknowledged the said writing to be their joint  
act and deeds, and Anna Zion wife of the said  
Abraham D. Zion being examined by me privily  
and apart from her said husband, and having  
the deed aforesaid fully explained to her declared  
that she had willingly signed and executed  
the same and does not wish to retract it.  
The said deed is thereupon admitted to record  
given under my hand this the 1st day of January.  
1881

John R. Gibson Clerk  
of Lee County Court.

Attest

John R. Gibson Clerk



John P. Zion  
True Copy of Deed  
Asd. Zion & wife  
Deed Book 1220  
Page 99.

A

Fee for this copy 50



This deed made this the 26<sup>th</sup> of December 1883 between David Smyth & wife of the one part & J. D. Zion of the second part, both of the Co. of Lee & State of Virginia. Witnesseth that for & in the consideration of the sum of \$125.00 one hundred & twenty five dollars, paid in hand paid by Jas. H. Parsons the receipt whereof is hereby acknowledged & by these presents doth grant bargain sell & convey unto the aforesaid J. D. Zion, with covenants of general warranty a certain tract or parcel of land lying and being in the Co. of Lee & State of Virginia, on the cane creek ridge, Bound as follows. beginning at a stake near the head of a spring dividing said spring N 28 W 12 poles to a beech. N 10 1/4 E 10 1/4 poles to a stake in the wagon road. S 23 1/2 E 14 poles to a stake S 48 1/2 E 4 poles S 69 E 16 poles S 63 1/2 E 2 poles S 22 1/2 E 14 poles S 21 1/2 E 6 P. S 4 E 8 poles S 23 W 10 P. S 26 3/8 E 8 1/2 poles S 26 1/2 W 4 1/2 P. to a stake on A. D. Zion's line and with said Zion's line N 72 1/2 W 5 1/4 P. to a stake on top of said ridge N 4 E 3 1/4 P. to a stake at the head of the spring at the beginning, containing by survey 13 3/4 acres to have and to hold the above tract with all of its appurtenances for ever witness whereof the above said David Smyth & wife doth bind themselves to warrant generally the title to the above tract or parcel of land to the aforesaid J. D. Zion witness whereof we have



hereto signed our signatures & seals the day  
& date above written.

David Smyth Seal  
Mary A. Smyth Seal

Virginia Lee County to wit:

I, J. A. B. Hyatt, a commissioner in chancery  
for the county court of Lee County do hereby  
certify that David Smyth and Mary A. Smyth,  
his wife whose names are signed to the fore-  
going deed bearing date on the 26<sup>th</sup> Decr. 1883,  
personally appeared before me in my court  
aforesaid and acknowledged the same to be  
their act and deed for the purposes therein  
stated, And the said Mary A. Smyth being  
examined by me privily & apart from her  
husband and having the aforesaid writing  
fully explained to her she the said Mary A.  
Smyth declared that she had willingly  
executed the same and does not wish  
to retract it, Given under my hand & this  
26. Decr. 1883.

J. A. B. Hyatt Comr &c  
Virginia Lee County Court Clerk's office the 19<sup>th</sup>  
day of February 1884. The foregoing deed  
bearing date the 26<sup>th</sup> day of Decr. 1883,  
between David Smyth & Mary A. his wife  
of the first part and J. P. Zion of the second  
part, all of Lee County Va was this day

filed in this office and admitted to  
record upon the certificate of J. A. B. Hyatt,  
a Commissioner in Chancery for the County  
Court of Lee County, Virginia,

Teste John R. Gibson Clerk.  
Attest  
Teste John R. Gibson Clerk



J. D. Zion

From 3 copy Deed

David Long the Vnfe

Deed Book 20.

Page 424.

"B"

Fee for this copy 50¢



This deed made this the 28th day of February 1884 by and between A. M. Parsons of the county of Lee and State of Virginia of the first part, and John P. Zion of the said County of Lee and State of Virginia of the second part Witnesseth that the parties of the first part, have this day for and in consideration of the sum of \$4000 Forty Dollars paid by Jas R. Parsons in hand paid the receipt whereof is hereby acknowledged and by these presents doth grant bargain sell and convey unto the party of the second part, one certain tract or parcel of land lying and being in the county of Lee and State of Virginia on the cane Creek ridge containing 4 four acres and thirty eight poles (more) be the same more or less and bounded as follows to wit: beginning at a stake, in the road leading from cane creek to Shavers forks, thence along a line of John S. Parsons land North 74° E 30 3/4 poles to a stake corner to the George Brider lot and with said line N 13° W 17 poles to a stake in the South edge of a road and with said road N 61° W 7 1/2 to a stake in same road and with same road as it meanders S 17° W 6 poles to a stake in first said road South 54° E 6 poles to a stake S 10° W 4 poles to a stake S 21° W 8 1/2 poles to a stake S 12 1/2° E 8 poles to the beginning to have and to hold the said tract or parcel of land with all the appurtenances thereto belonging forever and the parties of the first will warrant generally the title to the above described tract or parcel of land witness the following signatures and seals this the day



and year first above written.

Amanda M. Parsons *(Seal)*

State of Virginia Lee County to wit:-

I, John A. S. Hyatt a Commissioner in Chancery for the County Court of Lee County do hereby certify that Amanda M. Parsons whose name is signed to the foregoing deed bearing date Feb'y 28<sup>th</sup> 1884, personally appeared before me in my county aforesaid and signed and acknowledged the said deed to be her act and deed for the purposes therein stated, Given under my hand this 5<sup>th</sup> June 1884.

John A. S. Hyatt Com'r &c.

Virginia Lee County Court Clerk's office the 28<sup>th</sup> day of July 1884.

The foregoing deed bearing date February 28<sup>th</sup> 1884, between Amanda M. Parsons of the first part, and John P. Zion of the second part, both of Lee County Va was this day filed in this office and admitted to record upon the certificate of J. A. S. Hyatt Commissioner in Chancery for the County Court of Lee County Va.

Teste John R. Gibson Clerk.



John P. Zim  
From <sup>copy</sup> Deed

A. M. Parsons

Deed Book No 20

Page 550

"C"

Fee for this copy 40<sup>c</sup>



# THE COMMONWEALTH OF VIRGINIA,

TO THE SHERIFF OF LEE COUNTY—GREETING :

WE COMMAND YOU to summon

*Barbary J. Zion*

to appear at the Clerk's office of the Circuit Court of Lee County, at the Court House, on the first  
Monday *July* next, being Rule Day, to answer a Bill in Chancery exhibited in our  
Court against *her*, by *Willie D. Zion*

And have then and there this Writ. Witness, J. A. G. HYATT, Clerk of our said Court, at the  
Court House, this *25th* day of *June* 188*4*, in the 1*10* year of the Commonwealth.

*J. A. G. Hyatt* Clerk.

A COPY--TESTE:



(O.R.V.O.V.D.V.P.)

Willie D. Zion

vs  $\frac{3}{3}$  Spain Choy

Barbary J. Zion

Lo July Rules 1886

Entered by  
deceiving and  
affixing Capt. to

Barbary J. Zion

June 25-1886

R. D. Shuman  
836